

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*,

Plaintiffs,

V.

Case No. 1:17-CV-02989-AT

BRAD RAFFENSPERGER, *et al.*,

Defendants.

**NON-PARTY U.S. DOMINION, INC.'S NOTICE OF FILING AND REQUEST  
FOR GUIDANCE ON THE APPLICATION OF THE COURT'S  
PROTECTIVE ORDER**

Non-party U.S. Dominion, Inc. (“Dominion”) respectfully requests the Court’s guidance on an issue related to the Court’s continued sealing of the July 1, 2021 report drafted by the Curling Plaintiffs’ retained expert J. Alex Halderman (the “Plaintiffs’ Report”).

In March of 2022, Dominion retained the MITRE Corporation’s National Election Security Lab (“MITRE NESL”) to perform an independent evaluation of the Plaintiffs’ Report. MITRE NESL is a trusted authority on cybersecurity in the election space, and it provides election industry participants (including state, local, and federal officials) a means to maintain public trust and confidence in our election systems.

MITRE NESL has completed its evaluation; the Executive Summary from MITRE NESL's resulting report is attached herein as **Exhibit 1**. Nothing in the Executive Summary reveals any technical details regarding Georgia's voting system or the claims made in Plaintiffs' Report. Dominion would like to release the full MITRE Report to its customers, some of whom have heard public descriptions of the Plaintiffs' Report by Plaintiffs, Plaintiffs' expert and others, and sought further information on the topic from Dominion. Dominion does not believe doing so would contravene the Court's Protective Order (Doc. 477) in this case, but in an abundance of caution submits the full MITRE Report to the Court under seal, and seeks the Court's confirmation that it may release that full report to its current customers.

If the Court would like more information on this, Dominion would be happy to arrange for a MITRE representative to answer any questions the Court might have.

Respectfully submitted: September 19, 2022.

/s/ J. Matthew Maguire, Jr.  
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*Counsel for Non-Party U.S. Dominion, Inc.*

**CERTIFICATE OF COMPLIANCE  
AND SERVICE**

I hereby certify that the foregoing as prepared using Times New Roman font, 14-point type, which is one of the font and point selections approved by the Court in L.R. 5.1(B). I further certify that I filed the within and foregoing *Non-Party U.S. Dominion, Inc.'s Notice of Filing and Request for Guidance on the Application of the Court's Protective Order* using the CM/ECF system, which will automatically send notification of such filing to all counsel of record.

Respectfully submitted: September 19, 2022.

/s/ J. Matthew Maguire, Jr.  
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